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DEPARTMENT OF HEALTH & HUMAN SERVICES

Health Resources and Services Administration

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Rockville, Maryland 20857

Ms. Christi Shewman
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Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

SEP 12 2005 OCT 18 2005

Federal Communications Commission
Office of the Secretary

WQ Docket #04-36
05-196

Dear Ms. Shewman:

The Health Resources and Services Administration (HRSA) is submitting the following comments for your consideration in response to the Final Rule, E911 Requirements for IP-Enabled Services, published on June 29, 2005.

The HRSA requests that the Federal Communications Commission (FCC) expand the scope of its Final Rule, E911 Requirements for IP-Enabled Services, to include the national toll-free number (1-800-222-1222) for accessing the 61 poison centers located across the United States. The ability for consumers to reach their local or regional poison center is critical to safeguarding public safety. Poisoning is a major public health issue. Unintentional poisoning is the second leading cause of death for ages 35-54; the third leading cause of death for 25-34 year olds and 55-64 year olds; and the fourth leading cause of death to 15-24 year olds. Deaths are only the tip of the iceberg. Every day there are over 6,500 calls placed to poison centers throughout the United States. The calls originate from worried mothers of toddlers, despondent spouses, misguided adolescents, emergency departments, first responders, law enforcement and countless others. Poison centers assist callers by rapidly assessing health risk and routing patients to appropriate care based on their knowledge of local resources.

Just as Congress passed the 911 Act, Congress also passed the Poison Control Center Enhancement and Awareness Act [Public Law 106-174-Feb. 25, 2000]. That Act called for the establishment of a nationwide toll-free phone number to be used to access the 61 poison centers located nationwide. A nationwide toll-free number was established by Congress because poison centers have been recognized as a valuable national resource that provides life-saving and cost effective public health services. The nation-wide toll-free number routes callers to their regional poison center. To be effective, a regional poison center must have intimate knowledge of local hospital capabilities, regional antidote inventories, cultural needs of the population, and an established working relationship with the healthcare providers in the region it serves.

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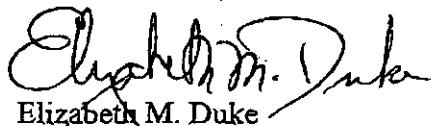
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Just as with E911, consumers calling the national toll-free poison number expect that voice over Internet Protocol (VoIP) services are interconnected with the public switch telephone network (PSTN) and will function in some ways like a "regular telephone." HRSA believes that the FCC Final Rule, E911 Requirements for IP-Enabled Services, should be amended requiring providers of interconnected VoIP service to also supply the national toll-free number (1-800-222-1222) capabilities to all of their customers as a standard feature of service. The Final Rule should also be amended to further require interconnected VoIP service providers to provide 1-800-222-1222 service to the callers appropriate geographical regional poison-center from wherever the customer is using the service, whether at home or away from home.

The amendment to expand the regulations to apply also to the national toll-free poison number (1-800-222-1222) will enhance public safety and ensure appropriate emergency services for users of interconnected VoIP services.

HRSA applauds your efforts to ensure that public safety is protected.

Sincerely,



Elizabeth M. Duke
Administrator